Exhibit 20

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division


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BMG RIGHTS MANAGEMENT (US) LLC,    :
et al.,                            :
               Plaintiffs,         :
                                   : Case No. 1:14-cv-1611
      vs.                          :
                                   :
                                   :
COX ENTERPRISES, INC., et al.,     :
               Defendants.         :
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HEARING ON MOTIONS

November 20, 2015

Before: Liam O'Grady, USDC Judge

APPEARANCES:

Walter D. Kelley, Jr., John M. Caracappa, Jeremy D. Engle,
Jeffrey M. Theodore, William G. Pecau, and Michael J. Allan,
Counsel for the Plaintiffs

Andrew P. Bridges, Brian D. Buckley, Jed Wakefield, and
Craig C. Reilly, Counsel for the Defendants

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1   met safe harbor, so most of that is out.

2   THE COURT: Right.

3   MR. ENGLE: The problem with most of the rest of Mr.

4   Rosenblatt's opinion is he lacks specialized knowledge to make

5   those opinions. He is not an industry expert. He has never

6   worked for an ISP. Cox labels him as a technologist, so his

7   testimony should be limited to technology.

8   We haven't moved to exclude his technical overview of

9   BitTorrent or his opinions about how Rightscorp's code works.

10 That's what he purports to have expertise in, and that's what

11 his opinion should be limited to.

12   In our brief we gave a couple examples of the

13 opinions where he has no specialized knowledge. That, for

14 example, is what other ISPs do with infringement notices. He

15 doesn't have any inside knowledge about that, no specialized

16 knowledge. He only knows what they publicly state. And as

17 we've seen in this case, what an ISP publicly claims to do can

18 be far different from what they actually do.

19   Another example is MarkMonitor. That is a company

20 that detects infringement and sends notice. Mr. Rosenblatt

21 claims to know everything he needs to know about MarkMonitor's

22 code based on a redacted 13-page summary and because some

23 employees of MarkMonitor have been on panels he's hosted.

24   That's an ironic position by Cox. They have been

25 very upset about not reviewing every single piece of source

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 1   code from Rightscorp over the last three-and-a-half years, yet

 2   they claim that based on his 13-page redacted summary and

 3   because some employees have been on panels, that Mr. Rosenblatt

 4   is able to fully analyze MarkMonitor's system for detecting

 5   infringement.

 6   Our bottom line with Mr. Rosenblatt, he should be

 7   limited to offering opinions within his purported area of

 8   specialized knowledge, that is overview of the BitTorrent, and

 9   opinions on the technical aspects of the Rightscorp source

10   code.

11   Thank you, Your Honor.

12   THE COURT: All right, thank you.

13   Why don't we do one -- go ahead and respond to that.

14   MR. BRIDGES: Thank you, Your Honor.

15   I am pleased at least we have some overlap with the

16   other side as to certain things that Mr. Rosenblatt can offer.

17   I would point primarily to the things that he had issued in

18   rebuttal to the plaintiff's case. There is the technical

19   tutorial, no debate about that.

20   Analysis of Rightscorp's code and how it was

21   unreliable. But beyond that, also Rightscorp's failure to

22   confirm infringements, failure to detect infringements. It's

23   failure to count infringements is very, very important.

24   He also is able as a technologist who is active where

25   technology and business processes work against a backdrop of a